

John A. Kawai, State Bar 260120
CARPENTER, ZUCKERMAN & ROWLEY
407 Bryant Circle, Suite F
Ojai, CA. 93023
Tel: (805) 272-4001
Fax: (805) 719-6858
Email: team3@czrlaw.com

Deborah A. Bianco, *Pro Hac Vice*
PO Box 6503
Bellevue, WA. 98008
Tel: (425) 757-4500
Email: deb@biancolaw.com

Carol L. Hepburn, *Pro Hac Vice*
PO Box 17718
Seattle, WA. 98127
Tel: (206) 957-7272
Fax: (206) 957-7273
Email: carol@hepburnlaw.net

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No: 4:19-cv-02184-PJH

“AMY,” “ERIK,” JANE SMITH, as next of
friend for “TORI,” minor, “JENNY,” and
“JESSICA,” “LILY,” “SARAH,” JOHN DOE
as court appointed conservator for “SIERRA,”
and “SALLY,” minors, JANE DOE as court
appointed conservator for “SKYLAR” and
“SAVANNAH,” minors, “MAUREEN,”
WILLIAM L.E DUSSAULT as Guardian ad
Litem for “VIOLET,” minor, JANE ROE, as
next of friend for “PIA,” and “MYA,” minors,

Plaintiffs,

v.

RANDALL STEVEN CURTIS

Defendant.

DECLARATION OF JOHN DOE IN SUPPORT OF
MOTION FOR APPROVAL OF MINOR
SETTLEMENT RE SALLY AND SIERRA

HEARING DATE:
TIME: 10:00 am
COURTROOM:

BEFORE HONORABLE MAGISTRATE JUDGE
LAUREL BEELER
UNITED STATES DISTRICT COURT

1 I, John Doe, hereby declare the following:

2 1. I, John Doe, am the father of the minor plaintiffs "Sally" and "Sierra" herein and am
3 the person known as "John Doe" in this matter. I have been appointed, along with my wife, as co-
4 conservator for the interests of each Sally and Sierra by the court in our home county. I make this
5 declaration in support of the motion of the parties for approval of the proposed settlement of the claims
6 herein.

7 2. My daughters have been represented by Ms. Hepburn since 2015 in matters relating to
8 their rights as victims of child pornography crimes. Ms. Hepburn and I have discussed many times the
9 nature of the claims which may be made on their behalf. We have also discussed several times the
10 processes involved in proceeding to trial with a civil claim.

11 3. I have reviewed the motion and the declarations of Carol L. Hepburn, John Kawai, and
12 Deborah Bianco, supporting the motion to approve the settlement. It is my understanding that each of
13 the plaintiffs including my two daughters would receive an equal pro-rata portion of the gross
14 proceeds of the settlement and also be responsible for an equal pro-rata share of the costs of the
15 litigation. . I understand that this settlement would provide a gross amount of \$ [REDACTED] to each
16 plaintiff including my daughters, and a net payout to each of \$ [REDACTED].

17 4. I participated in the final settlement conference via zoom on June 7, 2021.

18 5. I believe that the proposed settlement is a fair and reasonable one in that it provides a
19 certain recovery to each of the plaintiffs in the near term without the expenditure of additional costs
20 for trial and for collection.

21 6. I am in agreement with the allocation of one third of the gross recovery for attorneys'
22 fees in this matter. At the outset of our engaging Ms. Hepburn to represent our daughters, my wife
23 and I entered into a fee agreement providing for a one third contingency fee together with
24 reimbursement of reasonable out of pocket costs which she might expend. Our home county court
25 also approved this fee agreement in the course of our conservatorship action.
26
27
28

1 7. I have reviewed the listing of costs expended in this matter totaling [REDACTED] and
2 understand that each Sally and Sierra would each pay [REDACTED] from their gross settlement for
3 reimbursement of these. I have no objection to reimbursement of this amount.
4

5 8. As ordered by the court in our conservatorship action, all monies received on behalf of
6 our daughters, and including any funds coming from the resolution of this case, are place in a blocked
7 account. We are required to report to the court each year concerning all deposits and to provide
8 documentation concerning the activity in the account and the balance. No withdrawals are allowed
9 without an authorizing order of the court.

10 9. I ask on behalf of my daughters that the court approve this settlement as proposed in the
11 motion.

12 I hereby declare under penalty of perjury under the laws of the United States of America that
13 the foregoing is true and correct to the best of my knowledge.
14

15 DATED this 15th day of September, 2021.
16

17 [REDACTED]
18 [REDACTED]
19 John Doe, co-conservator and father of Sally and Sierra
20
21
22
23
24
25
26
27
28